

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ABG PRIME GROUP, INC., a Michigan  
Corporation,

Plaintiff,

vs.

Case No: 2:17-cv-12280  
Hon. Laurie J. Michelson

INNOVATIVE SALON PRODUCTS,  
INC., d/b/a LOMA, a State of Washington  
For-Profit Corporation; DAVID HANEN, an  
Individual; ALL ALLIANCE PRODUCTS,  
a d/b/a of Dean Prodromitis or Total Image  
International; DEMONSTHENES  
PRODROMITIS, a/k/a Dean Prodromitis;  
TOTAL IMAGE INTERNATIONAL, LLC,  
a Florida Limited Liability Company,

Defendants,

and

INNOVATIVE SALON PRODUCTS, INC.,  
d/b/a LOMA, a State of Washington For-Profit  
Corporation,

Counter-Plaintiff,

vs.

ABG PRIME GROUP, INC., a Michigan  
Corporation,

Counter-Defendant.

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**NOTICE OF FILING SUPPLEMENTAL AUTHORITY IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS FIRST AMENDED COMPLAINT  
FOR LACK OF PERSONAL JURISDICTION**

Defendants Demonsthenes Prodromitis, Total Image International, Inc., and “All Alliance Products” (collectively “the Florida Defendants”) hereby file as supplemental authority at Exhibit A the May 16, 2018 Order entered in *ABG Prime Group, Inc. v. Mixed Chicks, LLC*, Case No. 2:17-cv-13257, Dkt. 24 (Cleland, J.). The Florida Defendants file this authority in support of their respective motions to dismiss the First Amended Complaint for lack of personal jurisdiction [*see* Dkts. 34,39, 45] and for all other purposes appropriate under the rules.

Respectfully submitted,

Date: May 17, 2018

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- and -

/s/ James M. Matulis (w/consent)  
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*Attorneys for All Alliance, Demosthenes,  
and Total Image Int'l, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 17, 2018, I electronically filed with the Clerk of Court the foregoing document using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

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